

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TAMARA LOHR and RAVIKIRAN SINDOGI,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

NISSAN NORTH AMERICA, INC., and
NISSAN MOTOR CO., LTD.,

Defendants.

Case No. 2:16-cv-01023-RSM

**STIPULATION AND ORDER TO
FURTHER EXTEND CLASS
CERTIFICATION DEADLINES TO
FACILITATE SETTLEMENT
DISCUSSIONS**

Plaintiffs Tamara Lohr and Ravikiran Sindogi (“Plaintiffs”) and Defendant Nissan North America, Inc. (“NNA”) (collectively, the “Parties”) enter into this stipulation with reference to the following facts and recitals:

1. On March 28, 2019, the Parties had a productive all day private mediation before Hon. James L. Warren (Ret.) at JAMS in San Francisco.

2. Based on the Parties’ progress, a second all day mediation session has been scheduled for May 23, 2019.

3. The Parties are coordinating discovery and class certification deadlines in this action with a companion case filed in the Northern District of California, *Johnson v. Nissan N. Am., Inc.*, Case No. 3:17-cv-00517-WHO.

1 4. The Parties require additional time to continue mediation efforts before undertaking
2 further work to complete discovery in anticipation of class certification briefing and in anticipation of
3 the preparation of expert reports.

4 5. The Parties have agreed to extend the deadlines in this case and in *Johnson*, to
5 accommodate resolution discussions.

6 6. The Parties have coordinated with counsel in *Johnson* and are seeking entry of a similar
7 scheduling order. If this Court and the *Johnson* court approve these requests, then the two cases will
8 remain on parallel tracks if a resolution is not reached. An extension of the deadlines in this matter, as
9 reflected below, would facilitate settlement discussions and will not be unduly prejudicial to either
10 party.

11 For these reasons, the Parties stipulate to extend the deadlines in this matter as set forth below
12 and respectfully request that the Court enter an order accordingly:

Event	Current Deadline	Proposed Deadline
Deadline to file Motion for Class Certification and serve Plaintiffs' expert disclosures and reports	June 14, 2019	November 19, 2019
Deadline for Plaintiffs to produce experts for deposition	July 26, 2019	December 31, 2019
Deadline to file opposition to Motion for Class Certification and serve NNA's expert disclosures and reports	September 4, 2019	February 10, 2020
Deadline for NNA to produce experts for deposition	September 23, 2019	February 28, 2020
Deadline to file reply regarding Motion for Class Certification	October 14, 2019	March 19, 2020

1 STIPULATED TO AND DATED this 29th day of April, 2019.

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Dated: May 6, 2019.

RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE